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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

TIMOTHY MELLON, a Wyoming resident,) Cause No.: 13-CV-118-SWS
)
Plaintiff,)
vs.)
)
THE INTERNATIONAL GROUP FOR)
HISTORIC AIRCRAFT RECOVERY, a)
Delaware non-profit corporation and)
RICHARD E. GILLESPIE,)
)
Defendants.)
)

PLAINTIFF'S LISTING OF WITNESSES

COMES NOW Plaintiff in the above-captioned matter and pursuant to this Court's Order on Initial Pretrial Conference hereby presents its listing of witnesses in addition to those previously identified in its initial disclosures.

1. Jesse Rodocker – Seabotix, Inc. – 2877 Historic Decatur Road, Suite 100, San Diego, CA 92106 – Mr. Rodocker will testify regarding his work on the 2010 Niku VI

Expedition, including his work as an ROV contractor pilot, his activities viewing imagery during the expedition and his work determining the location of the ROV studies. Mr. Rodocker may also testify regarding all other matters within his personal knowledge relevant to the claims made in this case.

2. John Clauss – P.O. Box 13, Homewood, CA 96141 – Mr. Clauss will testify regarding his participation in the 2010 Niku VI Expedition, his discussion of the footage obtained during that expedition and work that he did to review the footage from the expedition. Mr. Clauss may also testify to any and all other matters within his personal knowledge related to the claims in this case.

3. R. Walter Holm – 1101 Knoll Drive, Apt. 10, Minlow Park, CA 94025 – Mr. Holm may testify regarding his participation in the 2010 Niku VI Expedition. He will testify regarding his involvement in planning the expedition and in follow-up to the expedition and all other matters within his personal knowledge related to the claims made in this case.

4. Arthur G. Carty – 23801 Tuscany Way, Benita Springs, FL 34134 – Mr. Carty will testify regarding his participation in the 2010 Niku VI Expedition. Mr. Carty will testify regarding his participation in the planning of that expedition and his follow-up work after the expedition. Mr. Carty will also be asked to testify regarding all other matters and his personal knowledge related to the claims made in this case.

5. Patricia Thrasher – Oxford Pennsylvania – Ms. Thrasher will testify regarding the financing of TIGHAR, the corporate operations of TIGHAR and the fund raising activities of TIGHAR and all other information within her personal knowledge related to the claims made in this case.

6. Graham G. Berwind III – 316 Isle of Palms Drive, Ft. Lauderdale, FL 33301-2550 – Mr. Berwind is a member of the TIGHAR Board of Directors and will testify regarding his knowledge of the 2010 and 2012 Expeditions regarding TIGHAR's fund raising efforts, regarding analysis of the relevant videos and other matters within his personal knowledge and related to the claims at issue in this case.

7. Brooke Runnette - address unknown – Ms. Runnette is a former executive producer for Discovery and worked with TIGHAR in coordinating Discovery's work on TIGHAR's expeditions. Ms. Runnette will be asked to testify regarding Discovery's contractual relationship with TIGHAR regarding certain rights to TIGHAR's discovery and regarding all other information within her knowledge and relevant to the claims made in this case.

8. Christine Weber – address unknown - Ms. Weber is an employee of Discovery and worked with TIGHAR in coordinating Discovery's work on TIGHAR's expeditions. Ms. Weber will be asked to testify regarding Discovery's contractual relationship with TIGHAR regarding certain rights to TIGHAR's discovery and regarding all other information within her knowledge and relevant to the claims made in this case.

9. Regen Jamieson – address unknown – New England Aquarium – will testify regarding analysis she performed for TIGHAR and requests for information submitted by TIGHAR related to the Niku VI 2010 and Niku VII 2012 Expeditions.

10. Colonel Patricia Webb – address unknown – Colonel Webb may be called to testify regarding fund raising efforts for the 2012 Niku VII Expedition.

DATED this 21st day of April, 2014.

/s/ Timothy M. Stubson

TIMOTHY M. STUBSON

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 21st day of April, 2014, the above and foregoing document was served upon counsel via electronic filing.

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/s/ Timothy M. Stubson

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